



TAKEN
5-4-09

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AGVISE Irrigation Water Report

Submitting Firm = CENEX HARVEST STATES
Grower Name = MARK FIX
Sample ID. = MC 0403 (4:05 pm)
Date Received = 5-6-04
Date Reported = 5-10-04

AGVISE Lab No 284

pH	8.4
Sodium	143 ppm
Calcium	69 ppm
Magnesium	52 ppm
Hardness mg equivalent CaCO ₃ /L	390 ppm
Sodium Absorption Ratio(SAR)	3.17
Conductivity	1.32 mmhos/cm
Total Dissolved Solids (calculated)	845 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



TAKEN 5-14-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES
Grower Name	= MARK FIX
Sample ID.	= MC 0404 (4:25 PM)
Date Received	= 5-17-04
Date Reported	= 5-18-04
AGVISE Lab No	321
pH	8.4
Sodium	163 ppm
Calcium	62 ppm
Magnesium	49 ppm
Hardness	361 mg equivalent CaCO ₃ /L
Sodium Absorption Ratio(SAR)	3.75
Conductivity	1.41 mmhos/cm
Total Dissolved Solids (calculated)	902 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



TAKEN 5-28-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0405 (2:30 PM)
Date Received	= 6-1-04
Date Reported	= 6-2-04
AGVISE Lab No	410
pH	8.5
Sodium	69 ppm
Calcium	56 ppm
Magnesium	39 ppm
Hardness	301 mg equivalent CaCO ₃ /L
Sodium Absorption Ratio(SAR)	1.72
Conductivity	0.90 mmhos/cm
Total Dissolved Solids (calculated)	576 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



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7 Aiken 6-7-04

AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0406 (12:05 PM)
Date Received	= 6-10-04
Date Reported	= 6-11-04
AGVISE Lab No	463
pH	8.3
Sodium	112 ppm
Calcium	67 ppm
Magnesium	49 ppm
Hardness	371 mg equivalent CaCO ₃ /L
Sodium Absorption Ratio(SAR)	2.54
Conductivity	1.18 mmhos/cm
Total Dissolved Solids (calculated)	755 ppm
Salinity Hazard	Very High
Sodium Hazard	Medium

Agricultural Testing



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TA142 6-21-04

AGVISE Irrigation Water Report

Submitting Firm	= CENEX HS - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0407 (3:15 PM)
Date Received	= 6-23-04
Date Reported	= 6-25-04
AGVISE Lab No	528
pH	8.5
Sodium	70 ppm
Calcium	55 ppm
Magnesium	41 ppm
Hardness	309 mg equivalent CaCO ₃ /L
Sodium Absorption Ratio(SAR)	1.74
Conductivity	0.88 mmhos/cm
Total Dissolved Solids (calculated)	563 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



TAKEN 6-30-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0408 (10:25 AM)
Date Received	= 7-3-04
Date Reported	= 7-7-04
AGVISE Lab No	570
pH	8.4
Sodium	120 ppm
Calcium	63 ppm
Magnesium	46 ppm
Hardness	351 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.80
Conductivity	1.18 mmhos/cm
Total Dissolved Solids (calculated)	755 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



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TAKEN 7-9-04

AGVISE Irrigation Water Report

Submitting Firm = CENEX HARVEST STATES - MILES CITY
Grower Name = MARK FIX
Sample ID. = MC 0409 (10:10AM)
Date Received = 7-12-04
Date Reported = 7-14-04

AGVISE Lab No 575

pH	8.1
Sodium	100 ppm
Calcium	48 ppm
Magnesium	29 ppm
Hardness	240 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.82
Conductivity	0.93 mmhos/cm
Total Dissolved Solids (calculated)	595 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



TAKEN 7-15-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES-MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC0410 (11:05AM)
Date Received	= 7/19/04
Date Reported	= 7/21/04
AGVISE Lab No	604
pH	8.4
Sodium	137 ppm
Calcium	60 ppm
Magnesium	40 ppm
Hardness	318 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	3.36
Conductivity	1.21 mmhos/cm
Total Dissolved Solids (calculated)	774 ppm
Salinity Hazard	HIGH
Sodium Hazard	LOW

Agricultural Testing



TAKEN 7-28-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0411 (8:30 AM)
Date Received	= 8-2-04
Date Reported	= 8-3-04
AGVISE Lab No	658
pH	8.3
Sodium	108 ppm
Calcium	51 ppm
Magnesium	41 ppm
Hardness	300 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.72
Conductivity	1.03 mmhos/cm
Total Dissolved Solids (calculated)	659 ppm
Salinity Hazard	HIGH
Sodium Hazard	LOW

Agricultural Testing



TAKEN 8-6-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0412 (3:05 PM)
Date Received	= 8-6-04
Date Reported	= 8-11-04
AGVISE Lab No	666
pH	8.5
Sodium	112 ppm
Calcium	52 ppm
Magnesium	44 ppm
Hardness	316 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.75
Conductivity	1.09 mmhos/cm
Total Dissolved Solids (calculated)	698 ppm
Salinity Hazard	Very High
Sodium Hazard	Low

Agricultural Testing



TAKEN 8-16-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES-MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0413 (8:30 AM)
Date Received	= 8-19-04
Date Reported	= 8-20-04
AGVISE Lab No	684
pH	8.3
Sodium	121 ppm
Calcium	59 ppm
Magnesium	47 ppm
Hardness	347 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.84
Conductivity	1.20 mmhos/cm
Total Dissolved Solids (calculated)	768 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



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TAKEN 8-26-04

AGVISE Irrigation Water Report

Submitting Firm = CENEX HARVEST STATES-MILES CITY
Grower Name = MARK FIX
Sample ID. = MC 0414 (10:40 AM)
Date Received = 8-30-04
Date Reported = 8-30-04

AGVISE Lab No 695

pH	8.2
Sodium	128 ppm
Calcium	62 ppm
Magnesium	49 ppm
Hardness	359 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.95
Conductivity	1.23 mmhos/cm
Total Dissolved Solids (calculated)	787 ppm
Salinity Hazard	Very High
Sodium Hazard	Medium

Agricultural Testing



TAKEN 9-7-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0415 (2:45 PM)
Date Received	= 9-10-04
Date Reported	= 9-10-04
AGVISE Lab No	719
pH	8.3
Sodium	150 ppm
Calcium	63 ppm
Magnesium	52 ppm
Hardness	376 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	3.38
Conductivity	1.34 mmhos/cm
Total Dissolved Solids (calculated)	858 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



TAKEN 9-17-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES-MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0416 (2:05 PM)
Date Received	= 9-20-04
Date Reported	= 9-21-04
AGVISE Lab No	724
pH	8.4
Sodium	102 ppm
Calcium	54 ppm
Magnesium	37 ppm
Hardness	289 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.62
Conductivity	1.05 mmhos/cm
Total Dissolved Solids (calculated)	672 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing



TAKEN 9-30-04

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AGVISE Irrigation Water Report

Submitting Firm	= CENEX HARVEST STATES - MILES CITY
Grower Name	= MARK FIX
Sample ID.	= MC 0417 (10:55 AM)
Date Received	= 10-4-04
Date Reported	= 10-5-04
AGVISE Lab No	733
pH	8.3
Sodium	87 ppm
Calcium	52 ppm
Magnesium	44 ppm
Hardness	314 mg equivalent CaCO ₃ /L
Sodium Adsorption Ratio(SAR)	2.15
Conductivity	0.98 mmhos/cm
Total Dissolved Solids (calculated)	627 ppm
Salinity Hazard	High
Sodium Hazard	Low

Agricultural Testing

SEA's Responses to Comment Letter P26
Mark Fix (December 9, 2004)

- P26.1 The commenter is concerned that no ROW is currently established through his ranch for this project. TRRC would enter into negotiations with each property owner regarding the acquisition of or easement across private property for a ROW following completion of the environmental review process, issuance of a final decision on the merits in Tongue River III and a final determination on the location of the alignment, following the completion of engineering.
- P26.2 The commenter identifies several concerns related to how the proposed project could affect his ranching operations. First, regarding the request for more detailed maps, please refer to Master Response 6, Maps of the Adopted and Proposed Alignments, and to Appendix A. These maps illustrate how the proposed refinements to the alignment approved in Tongue River I would relate to the calving pasture mentioned in the comment. As provided in recommended Mitigation Measure 5, TRRC would be required to consult with individual landowners during construction to minimize conflict between construction activities and ranching operations. This consultation would allow ranch operators to fully assess how the project would affect their operations and to work with TRRC to minimize adverse effects. Regarding the creation of wetlands and conservation easements, under recommended Mitigation Measure 31, TRRC would be required to identify lands appropriate for conservation easements to compensate for wildlife habitat that is lost as part of the construction of the ROW. This identification process would be done in consultation with private property owners as part of the negotiations for ROW acquisition.
- P26.3 The comment expresses concern regarding the compensation that would be offered for properties acquired as part of the ROW. The market value at the time of acquisition will determine the amount of compensation TRRC will pay for land, as determined through negotiation with individual landowners, or, if unsuccessful, through condemnation proceedings.
- P26.4 The Draft SEIS acknowledges that the project could affect existing agricultural operations and have effects on ranching operations in Section 4.3.1 of the Draft SEIS. Recommended Mitigation Measures 1 through 5 address potential impacts to ranching operations including direct and indirect loss of land, fencing, cattle passes, displacement of capital improvements, and impacts during construction. Under this mitigation, TRRC would be required to consult with individual land owners to minimize the disturbance to ranching activities, including calving, and would avoid or provide compensation for the loss of land or productivity.
- P26.5 The commenter raises concerns about the projects effect on the accessibility of cattle to water sources. Recommended Mitigation Measures 3, 4, and 5 were developed to address potential impacts to ranching operations. Under

recommended Mitigation Measure 3, TRRC would provide cattle passes at appropriate locations determined in consultation with individual land owners. The purpose of cattle passes is discussed in Master Response 18, Land Use Effects of the Project. Recommended Mitigation Measure 4 would require TRRC to relocate or replace any capital improvements such as water sources that are displaced as a result of construction. Recommended Mitigation Measure 5 would require TRRC to minimize conflicts between construction activities and ranching operations.

The effects of CBM development on water levels are analyzed in the Final Statewide Oil and Gas Environmental Impact Statement (January 2003).

- P26.6 Implementation of recommended Mitigation Measures 9 through 13 would be adequate to reduce impacts related to wildfires resulting from operation of the proposed Western Alignment or the approved Four Mile Creek Alternative.
- P26.7 The commenter suggests that a road be constructed in areas where no access to the railroad ROW exists to facilitate emergency response to fires and weed control. SEA has adequately addressed these issues. As required by recommended Mitigation Measure 12, TRRC would maintain a serviceable access road within the ROW during construction and operation of the rail line. The road would be accessible from points along the ROW at locations determined in consultation with the local fire officials, to permit entry to the railroad ROW of vehicles to aid in fire suppression. The road would also provide access for weed control.
- P26.8 No facilities (terminal and tracks) will be built in the Ft. Keogh area as a part of the project.
- P26.9 The comment requests that the locations of sidings be provided to the public. Based on preliminary engineering, all sidings would be located within the proposed 400-foot ROW, although the exact location of the sidings has not yet been determined. Regarding the comments related to fires, the provisions set forth in recommended Mitigation Measures 9 through 13 are intended to reduce the risks of fires and thereby protect personal property from fires. Regarding the comments on maps in the Draft SEIS, please refer to Appendix A and to Master Response 6, Maps of the Adopted and Proposed Alignments.
- P26.10 The commenter questions the location of the proposed alignment in relation to exhibits previously seen and how changes could affect his property. The SEIS analyzes a 400-foot-wide ROW corridor. The centerline of this proposed alignment is shown on the maps included in Appendix A of this Final SEIS. The exact location of the centerline may move within the 400-foot ROW as part of final design engineering and negotiations with individual land owners. Based on the information to date, TRRC has no intention of moving the alignment outside the 400-foot ROW analyzed in the Draft SEIS.

P26.11 The text on page 5-26 of the Draft SEIS has been revised to clarify which site numbers from the list on page 5-26 correspond to which residential structures on Figure 5-4 of the Draft SEIS. See Chapter 5: Errata, where it references Page 5-26, line 36.

P26.12 The comment raises concern over the project's effect on the Battle Butte Battlefield (now called the Wolf Mountains Battlefield). For a discussion of this issue, please refer to Master Response 14, Effect of the Project on the Battle Butte Battlefield.

As documented in Chapter 8 of the Draft SEIS, SEA acknowledges that not all impacts can be fully mitigated and that significant and unavoidable impacts would be associated with either the proposed Western Alignment or the Four Mile Creek Alternative in the areas of cultural resources, socioeconomics, native Americans, biology, land use, soils and geology, hydrology and water quality, transportation and safety, air quality, and noise.

P26.13 The commenter questions why project cost information from TRRC's supplemental evidence report was not included in the Draft SEIS. Construction costs from the supplemental evidence are included in Table 2-1 of the Draft SEIS.

P26.14 The comment calls for a new EIS that covers the entire route from Miles City to Decker. For a discussion of this issue, please refer to Master Response 16, The Need for a New EIS. Regarding the issue of public need, please refer to Master Response 9, Determination of Public Convenience and Necessity.

P26.15 This comment and comment 16 immediately following raise several questions related to the necessity of the project. The Board will address these issues in its final decision, to be issued following completion of the environmental review. All of the issues raised in these comments are addressed in Master Response 9, Determination of Public Convenience and Necessity.

P26.16 Please refer to the response provided for comment P26.15. See also the discussion of the proposed DM&E line to the Southern Powder River Basin on page 6-7 of the Draft SEIS.

P26.17 Coordination has not taken place to date between TRRC and the Powder River Gas Company (PRGC) concerning a possible overlap of facilities. If necessary, coordination would take place after TRRC has received approval for the proposed Western Alignment, or moved forward with the approved Four Mile Creek Alternative. Coordination would happen as part of the ROW acquisition process for the approved alignment, and TRRC would coordinate with PRGC on a plan for relocation, protection, and/or reimbursement related to the movement or damage of PRGC infrastructure.

- P26.18 The comment questions why the Draft SEIS does not consider the cumulative impacts of the railroad project in combination with CBM development. For a discussion of this issue, please refer to Master Response 21, Adequacy of Cumulative Analysis.
- P26.19 This comment raises concerns about inconsistencies between the State's TMDL process for the Tongue River watershed and the Tongue River Railroad EIS process, specifically: 1) a lack of coordination between the Surface Transportation Board and EPA relative to water quality protections; and 2) a failure within the Draft SEIS to demonstrate compliance with applicable water quality standards. For a discussion of these two issues, please refer to Master Response 20, Total Maximum Daily Load (TMDL).
- P26.20 The Draft SEIS notes that, without mitigation, the project could result in substantial increases in sedimentation of water resources but that with the incorporation of BMPs, erosion control methods, and revegetation, erosion can be reduced to near existing levels. The Draft SEIS therefore concludes that neither the Four Mile Creek alternative nor the Western Alignment would result in substantial adverse effects related to erosion and sedimentation. The Project therefore would not result in adverse effects to fish migration at the Tongue River and Yellowstone River diversion dam. For more information on erosion control, please refer to Master Response 12, Effects of the Project on Erosion and Sedimentation Rates. For information on cumulative effects on water resources from CBM wells, please see Master Response 21, Adequacy of Cumulative Impact Analysis.
- P26.21 The commenter raises several concerns related to the potential for increased sedimentation in the Tongue River, and notes that averages for electrical conductivity at Miles City have been exceeded. Measurements of electrical conductivity in water can be used to determine the total amount of suspended solids in a body of water. The exceedences of electrical conductivity of Tongue River were analyzed by way of discussing suspended sediment concentrations in section 4.2.4 in the Draft SEIS. As discussed above and in the Draft SEIS, the approval and implementation of recommended Mitigation Measure 36, which requires the incorporation of BMPs, erosion control methods, and revegetation, would maintain erosion rates at existing levels. For more discussion of this issue, please refer to Master Response 12, Effects of the Project on Erosion and Sedimentation Rates.
- P26.22 The comment suggests that water used for irrigation in the Tongue River Valley would be degraded to the point that it could adversely affect the ability to commercially cultivate the land, which would have secondary economic impacts. For a discussion of the project's potential effect on water quality in the Tongue River, please refer to Master Response 12, Effects of the Project on Erosion and

Sedimentation Rates, and Master Response 20, Total Maximum Daily Load (TMDL).

Comment suggesting that the project would devalue property in the area is noted. The negotiation for the acquisition of properties would include consideration of any effect of the proposed project on the subsequent fair market value of the property.

P26.23 The comment questions the need of the project given the existing rail lines already serving the Decker and Spring Creek areas. For a discussion of this issue, please refer to Master Response 9, Determination of Public Convenience and Necessity.

P26.24 The comment suggests that the project would eliminate Montana's competitive advantage in the coal market. For a discussion of this issue, please refer to Master Response 11, Loss of Competitive Advantage Held by Montana Coal.

P26.25 The comment identifies several potential impacts related to the project, including the destruction of farms and ranches, spread of noxious weeds, wildfires, hazards of railroad crossings, and cattle being blocked from water sources. Most of these issues have been raised in previous comments in this letter. SEA believes that the implementation of the final recommended mitigation measures listed in this Final SEIS would adequately mitigate the environmental impacts of the rail line by eliminating some potential impacts and reducing others to the extent possible. The specific issues raised by the comments and the mitigation measures related to the issues identified in this comment include:

Destruction of farms and ranches: SEA acknowledges in Chapter 8.0 of the Draft SEIS that conversion of agricultural land would be an unavoidable adverse environmental effect associated with this project. Recommended Mitigation Measures 1, 3, and 5, are related to land use and are specifically intended to reduce the project's effect on farming and ranching operations.

Noxious Weeds: The potential spread of noxious weeds would be controlled through the implementation and monitoring required by recommended Mitigation Measure 21.

Wildfires: Implementation of recommended Mitigation Measures 9 through 13 would be adequate to reduce impacts related to wildfires resulting from implementation of the proposed Western Alignment or the approved Four Mile Creek Alternative.

Railroad Crossings: Implementation of the MOA between TRRC and the Montana Department of Transportation (MDT), as required by recommended Mitigation Measure 55, would reduce hazards related to railroad crossings. The MOA requires an evaluation of each crossing to identify appropriate safety

measures such as warning signals and devices or grade separation where necessary to ensure safety.

Obstruction of Cattle from Water Sources: Recommended Mitigation Measure 3 is specifically intended to address access restrictions. This measure would require that TRRC install cattle passes along the railroad ROW to ensure passage of cattle under the rail line. TRRC would work with landowners to identify appropriate locations for these passes. The effectiveness of this measure would be tracked as part of the reporting required under recommended Mitigation Measure 17.

P26.26 This comment is not related to data from the environmental documents relative to Tongue River I, Tongue River II, or Tongue River III.

P26.27 The commenter questions why the Draft SEIS does not analyze the effects associated with the development of four power plants mentioned in the attached Custer County Resolution. The purpose of Custer County Resolution number 2004-29 is to formalize the Custer County Board of Commissioners' support of the Otter Creek Coal Development Project. However, the development is still speculative in nature, and will remain so until actual permit/project applications are submitted that define the scope of such development. Therefore, the potential development of the Otter Creek tracts and the four power plants mentioned in the Resolution 2004-29 are not analyzed in the Draft SEIS because they are not reasonably foreseeable at this point and meaningful evaluation would not be possible.

P26.28 The commenter questions why the Draft SEIS does not analyze the effects of development at the Otter Creek tracts when such development is used to justify the economic feasibility of the project. SEA has given appropriate consideration to the development of new mines as a result of this project in the SEIS, and maintains its position that the viability of this project proposal is not contingent upon such development going forward. Please see Master Response 21, Adequacy of Cumulative Impact Analysis, at the sub-heading: "Effect of potential reasonably foreseeable future coal mining."

P26.29 As stated in Section 4.3.3.2 of the Draft SEIS, several geotechnical studies have been completed along the proposed rail line, including the proposed Western Alignment. SEA consulted EPA and MDEQ and performed its own analysis, to identify impacts on soils and geology arising from construction of the proposed Western Alignment and to ensure that the information in the EIS for Tongue River II involving the approved Four Mile Creek Alternative remained accurate and up to date. The estimated costs provided in the Draft SEIS of the construction do include the costs for all blasting and material removal associated with the proposed Western Alignment.

P26.30 The comment questions whether on-the-ground wildlife studies would be performed prior to issuance of this Final SEIS. For a discussion of this issue,

please refer to Master Response 2, Biological Resources - Conclusions and Mitigation and Master Response 1, Adequacy and Timing of Studies.

P26.31 The comment concerns the water sources that would be used for the project and whether such sources have sufficient capacity. For a discussion of these issues, please refer to Master Response 19, Availability of Water During Construction.

P26.32 The comment opposing the project is noted.